

Dove A.E. Burns
Direct Dial: 917.994.2550
dove.burns@obermayer.com
www.obermayer.com

Memo Endorsed

521 Fifth Avenue
34th Floor
New York, NY 10175

November 6, 2019

FILED ELECTRONICALLY VIA ECF

Magistrate Judge Ona T. Wang
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Application Denied. Expert disclosures are to be completed by December 31, 2019. Parties have not identified a date by which expert reports will be produced, and this schedule is overly protracted. By November 15, 2019, parties are directed to submit a revised schedule with an expert discovery completion date of **March 31, 2020**.

SO ORDERED.



Ona T. Wang 11/12/19
U.S. Magistrate Judge

Re: Faye Melendez v. Hanover Ventures Marketplace LLC, et al
Docket No.: 1:18-cv-04897-PGG

Dear Magistrate Judge Wang:

The undersigned represent the parties in the above-captioned matter. We write to provide a proposed schedule for expert discovery, in accordance with Your Honor's October 31st Order. (Doc. 65.)

The parties propose the following deadlines:

- 1/13/20 – Plaintiff to disclose all expert witnesses, including any treating medical providers
- 2/13/20 – Depositions of plaintiff's expert witnesses/treaters
- 3/31/20 – Defendants to disclose all expert witnesses and to conduct any independent medical exams
- 4/30/20 – Depositions of defendants' expert witnesses

Respectfully Submitted,

/s/ Daniel Altaras
Daniel Altaras

/s/ Dove A.E. Burns
Dove A.E. Burns

Cc: Daniel Altaras, Esq.